

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:10CR345
	:	
Plaintiff,	:	
	:	JUDGE LESLEY WELLS
vs.	:	
	:	MOTION TO CONTINUE
JONATHAN WALTMAN,	:	FINAL PRETRIAL AND
	:	TRIAL DATES
Defendant.	:	

Defendant, Jonathan Waltman, through counsel, hereby moves this Court to continue his final pretrial and trial dates, currently set for May 3 and May 9, 2011 respectively, for approximately thirty (30) days. The reason for this request is that undersigned counsel just recently received a significant amount of discovery in this case. Mr. Waltman originally requested discovery on December 14, 2011 and thereafter, as well. This has necessitated additional follow up and requests for additional information that the U.S. Attorney is in the process of gathering. While counsel anticipates that the parties will reach a resolution in this case, the additional discovery just provided to defense counsel necessitates this request for a continuance. Both parties are continuing in their efforts to reach a plea agreement in this case. Pursuant to 18 U.S.C. § 3161(h)(7)(A), Mr. Waltman asks this Court to find that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

s/Debra Kanevsky Migdal
DEBRA KANEVSKY MIGDAL (#0058762)
Assistant Federal Public Defender

50 S. Main St., Ste. 700

Akron, OH 44308

Phone: 330-375-5739 Fax: 330-375-5738

e-mail address: debra_migdal@fd.org.

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2011, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/Debra Kanevsky Migdal
DEBRA KANEVSKY MIGDAL
Assistant Federal Public Defender